

TECHNICAL REVIEW DOCUMENT
for
RENEWAL OF OPERATING PERMIT 95OPDE113
to be issued to:

Brite-Line Technologies, LLC
Denver County
Source ID 0311526

Revised October 2013

Operating Permit Engineer:	Geoffrey Drissel
Operating Permit Supervisor review:	Matthew Burgett
Field Services Unit review:	Paul Carr

I. Purpose:

This document will establish the basis for decisions made regarding the applicable requirements, emission factors, monitoring plan and compliance status of emission units covered by the renewal operating permit proposed for this site. The original Operating Permit was issued April 1, 1998. This document is designed for reference during the review of the proposed permit by the EPA, the public, and other interested parties. The conclusions made in this report are based on information provided in the renewal application submitted May 21, 2013. Please note that copies of the Technical Review Document for the original permit and any Technical Review Documents associated with subsequent modifications of the original Operating Permit may be found in the Division files as well as on the Division website at <http://www.colorado.gov/cs/Satellite/CDPHE-AP/CBON/1251596446069>. This narrative is intended as an adjunct for the reviewer and has no legal standing.

Any revisions made to the underlying construction permits associated with this facility made in conjunction with the processing of this operating permit application have been reviewed in accordance with the requirements of Regulation No. 3, Part B, Construction Permits, and have been found to meet all applicable substantive and procedural requirements. This operating permit incorporates and shall be considered to be a combined construction/operating permit for any such revision, and the permittee shall be allowed to operate under the revised conditions upon issuance of this operating permit without applying for a revision to this permit or for an additional or revised construction permit.

II. Source Description:

This source is classified as a manufacturer of highway marking products under

Standard Industrial Classification 3069 for fabricated rubber products. Processes include a tape coating line and testing equipment. The tape in the coating line is painted, covered with glass beads, oven dried, coated with glue and a release agent, oven dried again, rewound and slit to size.

The facility is located in the Denver Metro Area. The Denver Metro Area is classified as attainment/maintenance for particulate matter less than 10 microns in diameter (PM10) and carbon monoxide (CO). Under that classification, all SIP-approved requirements for PM10 and CO will continue to apply in order to prevent backsliding under the provisions of Section 110(l) of the Federal Clean Air Act. The Denver Metro Area is classified as non-attainment for ozone and is part of the 8-hr Ozone Control Area as defined in Regulation No. 7, Section II.A.16.

This facility is categorized as a NANSR minor stationary source (Potential to Emit VOC < 100 Tons/Year). The source is also currently considered to be a minor source for purposes of Prevention of Significant Deterioration (PSD) regulations (Potential to Emit < 250 tpy). Facility-wide potential and actual emissions are as follows:

<u>Pollutant</u>	<u>Potential to Emit (TPY)</u>	2012
		<u>Actual Emissions (TPY)</u>
VOC	44.93	19.3
HAPs	44.93	8.3

(Note: the HAPs consist mostly of Toluene)

Potential emissions for VOC are as limited in the current Operating Permit, HAPs emissions are as calculated in the Title V application. Actual emissions estimates are based on APEN data submitted with the renewal application. The applicant certified that they are not subject to the requirements of Section 112(r) of the Clean Air Act Amendments of 1990.

MACT Applicability

JJJJ – Paper and Other Web Coatings:

Based on the information provided by this source, Brite Line is a major source of HAPs (i.e. facility-wide potential to emit of greater than 10 tons per year of any single HAP or greater than 25 tons per year of all HAPs combined). As such, the facility is subject to the National Emissions Standards for Hazardous Air Pollutants: Paper and Other Web Coatings, 40 CFR Part 63, Subpart JJJJ. MACT JJJJ includes requirements that limit the emissions of hazardous air pollutants from paper and other web coating operations, including limits on the HAP content of the coating materials applied at affected sources. The conditions listed in the

Operating Permit reflect the current rule language as of the revision to MACT JJJJ published in the Federal Register on 12/4/2002.

Reg 7 Applicability

Section IX.A.7 of Regulation No. 7 requires owner/operators of surface coating operations to minimize fugitive VOC emissions through the implementation of specific control techniques and work practices. These requirements have been incorporated into the conditions for the Brite-Line tape coating line.

Section IX.J of Regulation No. 7 describes VOC emission limitations for plastic-film coating operations. This section specifically excludes applicability to the coating of rubber webs or sheets and, thus, is not applicable to the Brite-Line operation.

II. Discussion of Modifications Made:

Source Requested Modifications

The source requested the following changes to the permit in their renewal application:

- Increase the annual VOC limit from 34.56 tpy to 44.93 tpy for Unit P010, the Tape Coating Line.
- Remove Unit P020, the Thermo Plastic Mixer Bagger.

Other Modifications

In addition to the requested changes, the Division has included changes to make the permit consistent with recently issued permits, to include comments made by the EPA on other Operating Permits, to reflect updated and current Regulatory language, as well as to correct errors or omissions identified during review of this renewal.

The Division has made the following revisions, based on recent internal permit processing decisions and EPA comments, to the Brite-Line Operating Permit:

Section II – Specific Permit Terms

Condition 1.3 of the Tape Coating Line requirements was expanded to list the fugitive VOC control requirements of Regulation No. 7, Section IX.A.7 in greater detail.

Condition 1.4 of the Tape Coating Line requirements was expanded to list the requirements of MACT JJJJ in greater detail.

Section IV – General Conditions

The General Conditions section was replaced with the most current version.

Appendices

The Division contact person in Appendix D was updated.

IV. Greenhouse Gasses:

The potential-to-emit of greenhouse gas (GHG) emissions from this facility is less than 100,000 TPY CO₂e. Future modifications greater than 100,000 TPY CO₂e may be subject to regulation (Regulation No. 3, Part A, I.B.44).